

Enforcement Confidential: DO NOT RELEASE

**Clean Air Act - Section 112(r)
Risk Management Program
Inspection Report**

FACILITY INFORMATION:

Name: J.R. Simplot Company Soilbuilders
Physical Address: 531 South Booker Road, Othello, WA, 99334
Phone Number: (509) 488-2132
EPA Facility ID#: 1000 0008 7014

CONTACT INFORMATION:

Name: Greg McCoy, Area Operations Manager, Upper Columbia Basin
Mailing Address: 531 South Booker Road, Othello, WA, 99334
Phone Number: (509) 488-2132

CONDITIONS:

Weather: Sunny and Hot
Inspection Date: 8/13/03
Inspection Time: 2:00 PM thru 4:40 PM
Inspectors: Harry Bell, EPA, Lead Inspector
Ted Mix, EPA, Inspector, EPCRA
Justin Mahaffa, EPA, Inspector
Suzanne Dolberg, E&E, Inspector

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with the requirements outlined in Section 112(r) of the Clean Air Act and 40 Code of Federal Regulations Part 68. Also during the inspection, one team member collected information to determine compliance with the Emergency Planning Community Right-to-Know Act (EPCRA). The EPCRA inspector's findings are not discussed as part of this report.

INSPECTION ENTRY:

Inspection entry was lead by Dr. Harry Bell. The inspection team was greeted by Mr. Greg McCoy, Area Operations Manager, and escorted to the facility's conference room to meet the other J.R. Simplot Company employees participating in the inspection. The J.R. Simplot Company employees participating in the inspection include the following:

Greg McCoy Area Operations Manager

Paul Dehrig	Headquarters Environmental, Health, and Safety (EH&S) Manager
Jim Duke	Headquarters Safety Manager
Garin Erickson	Regional EH&S Manager

After introductions had been made, Dr. Bell explained the purpose of the visit and presented his credentials. Dr. Bell then requested that the facility's operations and the safety measures that should be taken during a tour around the facility be discussed. These items were discussed followed by a tour of the facility. After a tour of the facility, the team reviewed the facility's Risk Management Program (RMP) documentation.

GENERAL INFORMATION:

The Simplot Soilbuilders facility, a wholly owned subsidiary of the J.R. Simplot Company, is a farm supply retailer that offers crop production products and services. Some of the crop production products sold at the facility include dry and liquid fertilizers, pesticides, and herbicides. The facility was constructed in the 1960s and operated by Van Waters and Rogers until 1972 when the J.R. Simplot Company purchased it. The facility has not changed ownership since that time.

The only RMP chemical stored and used at the Simplot Soilbuilders facility is anhydrous ammonia. They have a 130,000-pound storage tank on site that is used in the process of making a non-hazardous liquid fertilizer known as Ammonium Polyphosphate Solution 10-34-0. The maximum amount of ammonia that the Othello Simplot Soilbuilders would ever have on site is approximately 155,000 pounds. This would occur when there is a railcar on site filling the 130,000 pound storage tank.

The process of manufacturing Ammonium Polyphosphate Solution 10-34-0 consists of mixing anhydrous ammonia from the on-site storage tank, 68% solution of phosphoric acid from a rail car, and water in a batch tank where it is mixed to form the fertilizer. The batch tank reactor is 25 feet tall and 11 feet in diameter. Because the reaction is exothermic, the product needs to be cooled prior to piping it into a storage tank. The liquid product exiting the reactor is sent through a countercurrent double pipe heat exchanger that is cooled by anhydrous ammonia as it is fed into the reactor. The process is complete once the phosphoric acid railcar is empty, which typically takes about 18 hours. Othello Simplot Soilbuilders manufactures Ammonium Polyphosphate Solution 10-34-0 between the months of May and September.

The Othello Simplot Soilbuilders currently employs about 18 people and operates Monday through Friday, 8 hours per day and half of a day on Saturdays. Two of the full-time employees have been trained in ammonia safety and emergency response. However, these employees are not trained or qualified to make an entry into a hazardous atmosphere, rather they are only qualified to isolate a release from an upwind location. Simplot has contracted an emergency response contractor who would respond in the event of a major release. Their emergency response contractor is located in Spokane, Washington. The local fire department visits the facility at least once per year to familiarize themselves with the facility and the Ammonium Polyphosphate Solution manufacturing process; however, the local fire department is not trained or certified to enter hazardous atmospheres. The Othello Simplot Soilbuilders facility has not had any accidental releases of ammonia but have experienced one release due to theft. This theft occurred on July 8, 2002.

The Othello Simplot Soilbuilders facility has had ammonia stolen from them once and another attempt was made to steal ammonia from them a second time. Both incidents occurred in 2002. The second attempt was not successful as law enforcement officers arrived on site just in time to apprehend the perpetrators. As a result of these thefts, the facility has increased site security measures and anticipates adding more security measures in the near future. Site security at the facility consists of a barbed-wire topped chain link fence that is locked when the facility is not occupied. The valves on the ammonia storage tank also are locked and the power to the ammonia pump is turned off when not in use. A motion sensor-activated light also has been installed in the ammonia storage area and plans are underway to add another fence around the ammonia transfer hose.

OBSERVATIONS:

The inspection team conducted a walk around the area where Ammonium Polyphosphate Solution 10-34-0 is produced. The process equipment appears frequently used yet well maintained. All above ground storage tanks have containment around them. Access to the ammonia storage tank is restricted by a locked barbed-wire-topped chain link fence. Other measures have been taken to make it difficult to steal ammonia and include the measures discussed above.

As part of the inspection, the inspection team reviewed the facility's RMP documentation. The RMP was easily accessible, organized, and appeared complete. During the review of Simplot's RMP documentation, it was noted that the emergency contact information was incorrect. The copy of Simplot Soilbuilders' RMP that the EPA has indicates that the emergency contact is Richard Jaeger; however, the current emergency contact is Greg McCoy, Area Operations Manager.

During the inspection, Simplot told EPA inspectors that they conducted predictive filing; however, in the EPA's copy of Simplot Soilbuilders' RMP, it does not indicate that they have conducted predictive filing. Additionally, it was noted by one of the inspectors that some of the follow up actions resulting from one of their incident investigations were not documented sufficiently. It was unclear to the inspector if recommendations were followed up on.

FOLLOW-UP ITEMS:

The Othello Simplot Soilbuilders facility in Othello, Washington, appears well maintained, and their RMP appears complete. No follow up items were identified; however, a few recommendations were made at the end of the inspection. The recommendations are as follows:

1. The emergency contact information on the EPA's copy of Simplot Soilbuilder's RMP is not current. This information needs to be updated as soon as possible.
2. Othello Simplot Soilbuilders reported to the inspection team that they do predictive filing with their RMP; however, the EPA's copy of Simplot's RMP indicates otherwise. It is recommended that this discrepancy be resolved.
3. Concern was raised over following up on incident investigation recommendations. The recommendation was made that the person responsible for implementing the incident investigation ensure that the entire process is carried out and that all of the documentation is complete.

4. Unrelated to the implementation of the RMP, concern was raised over site security. Although several measures have been taken to make site security stronger, more measures could be taken to prevent further attempts at ammonia theft. Simplot Soilbuilders is encouraged to continue improving their site security.

PHOTOGRAPH IDENTIFICATION SHEET

**Simplot Soilbuilders
Othello, Washington**

Photo	Date	By	Direction	Description
1	8/13/03	SD	N	A view of the 10-34-0 batch mixing tank.
2	8/13/03	SD	SE	A view of the reactor pipe that feeds the batch tank.
3	8/13/03	SD	NE	Same as Photo 2, with a view of the pump that feeds the tank.
4	8/13/03	SD	N	A view of the 30,000-gallon ammonia storage tank.
5	8/13/03	SD	E	Another view of the reactor pipe that feeds the batch tank.
6	8/13/03	SD	NE	A view of the heat exchanger that cools product with ammonia from the storage tank.
7	8/13/03	SD	N	Another view of the ammonia storage tank.

Key:

E East
N North
NE Northeast
SD Suzanne Dolberg
SE Southeast